

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 11, 1990

Ms. Betty-Grace Terpstra
Scott Paper Company
Suite 901
1726 M Street
Washington, D.C. 20036

Dear Ms. Terpstra:

Thank you for your letter dated April 13 regarding absorbent incontinence products manufactured by Scott Paper Company. In your letter you requested information on the regulatory status of wastes generated in a health-care setting, which are used to treat incontinency.

The Part 259 regulations define medical waste as "solid waste generated in the diagnosis, treatment (e.g., provision of medical services), or immunization of human beings or animals, in research pertaining thereto, or in the production or testing or biologicals." Regulated medical waste (RMW) is a subset of the medical wastestream. The classes of RMW and a description of each class are listed in Section 259.30(a). As you are aware, items used in the treatment of incontinency are not specifically listed in any of the classes, however, these items would be regulated in specific situations. For instance, these items would be regulated when they are used in treatment and:

1. The item is saturated and/or dripping with human blood;
2. The item has been saturated and/or dripping with blood but it is now caked with dried human blood;
3. The item is saturated and/or dripping with certain body fluids as defined in Section 259.10(b). Semen and vaginal secretions are included in this definition; or
4. The item is contaminated with blood, excretions, exudates, or secretions from humans who are isolated to protect others from certain highly communicable diseases.

Finally, you should know that all transporters are required under Section 259.72 to notify the Agency that they are transporting RMW and receive an identification number.

If you need further information, or have additional questions please contact Mary Greene of my staff, at 202-475-7736.

Sincerely,

Devereaux Barnes, Director
Characterization and Assessment

cc: Austine Frawley, Reg. I
George Meyers, Reg. II
Estelle Bulka, OWPE

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